

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

FIRESTAR DIAMOND, INC., *et al.*

Debtors.

Chapter 11

No. 18-10509 (SHL)

(Jointly Administered)

RICHARD LEVIN, Chapter 11 Trustee of
FIRESTAR DIAMOND, INC., FANTASY, INC.,
and OLD AJ, INC. f/k/a A. JAFFE, INC.,

Adv. Proc. No. 19-1102 (SHL)

Plaintiff,

v.

NIRAV DEEPAK MODI, MIHIR BHANSALI,
and AJAY GANDHI,

Defendants.

NOTICE OF FILING OF REDLINED VERSION OF FIRST AMENDED COMPLAINT

1. On March 27, 2019, Chapter 11 Trustee Richard Levin (the “**Trustee**”), plaintiff in the above-captioned adversary proceeding, filed his *Complaint Against Insiders for Breach of Fiduciary Duty, Aiding and Abetting Breach of Fiduciary Duty, Corporate Waste, and Violations of the Racketeering Influenced Corrupt Organizations Act* [Adv. Dkt. 1] (the “**Original Complaint**”).

2. On September 20, 2019, the *Trustee* filed his *First Amended Complaint Against Insiders for Breach of Fiduciary Duty, Aiding and Abetting Breach of Fiduciary Duty, Corporate Waste, and Violations of the Racketeering Influenced Corrupt Organizations Act* [Adv. Dkt. 28] (the “**First Amended Complaint**”).

3. A redline of the First Amended Complaint against the Original Complaint is attached hereto as **Exhibit A**.

Dated: September 20, 2019,

New York, New York

Respectfully submitted,

JENNER & BLOCK LLP

By: /s/ Vincent E. Lazar

Vincent E. Lazar

Angela M. Allen (admitted *pro hac vice*)

353 North Clark Street

Chicago, Illinois 60654

(312) 222-9350

vlazar@jenner.com

aallen@jenner.com

Carl N. Wedoff

919 Third Avenue

New York, New York 10022

(212) 891-1600

cwedoff@jenner.com

Counsel for the Chapter 11 Trustee